



CITY OF BETHLEHEM

BUREAU OF PLANNING AND ZONING

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February 3, 2023

SWB LR, LTD.; RMLP-MT, LP;
HMLP-MT, LIMITED PARTNERSHIP; AND
8TH & EATON HOLDINGS, LP
190 Brodhead Road, Suite 110
Bethlehem, PA 18017

RE: **(23-002 LD Master Plan) – #23010007 – Martin Tower Complex *Revised* Master Plan Review – 1170 Eighth Avenue, Ward 13, Zoned OMU, Plans dated January 10, 2023.**

Dear Mr. Wagner,

This project is located in the OMU, Office Mixed Use Zoning District. Therefore, as noted in Section 1314.03 of the Zoning Ordinance, an Overall Master Plan is required prior to the development of any new buildings and prior to any land development reviews. All phases of development shall proceed in accordance with the Overall Master Plan following approval from the Planning Commission. If the proposed uses of the site change over time, then the Overall Master Plan shall be revised and approved by the Planning Commission.

An initial Overall Master Plan was submitted and reviewed by the Planning Commission in May 2019. This *revised* Overall Master Plan is submitted for consideration because there are now some changes to the proposed uses and the layout of the site.

The following comments were developed recognizing that this is a Master Plan and not a land development plan. The Master plan lacks much of the information necessary for a thorough engineering or traffic evaluation and has been reviewed only for general conformance to City of Bethlehem standards to the extent permitted by the details provided. Additional comments will be provided when more detailed land development plans are submitted for review.

1. The amount of impervious coverage has been substantially reduced from the prior Master Plan because much of the parking is proposed to be located underneath the buildings. Opportunities for increased greening of the site should be maximized.
2. The future use of Lot 1 shall be clarified.
3. Parking between Eaton Avenue and the Lot 2 building should be minimized.
4. Opportunities to integrate uses through things like design and shared parking should be maximized.
5. The development proposes more than 1000 dwelling units on the site, but they appear to be uniform in design and unit type. A variation of housing types and design should be incorporated on the site to allow for a variety of residential uses and greater sustainability of the site. For example, consideration could be given to mixed use buildings with residences above non-residential uses, twins, townhomes, etc.
6. The ordinance requires 10% of the lot to be held in open space. Virtually all of the designated open space is on steeply sloped and heavily wooded land. Opportunities for gathering and open space are increased from the prior Master Plan. Clarify which spaces are intended to be private and which are available for shared public use. Proposed public spaces should be coordinated with the City.
7. The Overall Master Plan must show how the development is proposed to be phased, whether any new lot lines are to be created and whether any areas are proposed to be dedicated to the City, including street rights of way.

8. Access to and utilization of the existing surrounding trail system, including the Monocacy Way Trail, is shown on the Master Plan as well as improvements to sidewalk connections and circulation, grade crossings, signage and other pedestrian circulation. Clarification of how the amenities and improvements are to be constructed shall be clarified.
9. The Master Plan should retain and include design elements that reflect the history and heritage of the site. This is being done very successfully on the BethlehemWorks property in south Bethlehem. Please clarify how that is proposed to occur at this site as well.
10. The plan shows the detention pond as a stormwater facility on a sloped and heavily wooded area of the site. We recommend that the site include infiltration and other alternative measures for stormwater management other than a detention pond, if at all possible. If a pond is necessary, it should not be located on sloped or wooded areas. Disruption of the slopes or wooded and natural areas should be avoided. Alternatives for stormwater collection should be considered and submitted.
11. Proposed pedestrian and bicycle safety improvements have been included in the Plan. Pedestrian upgrades at intersections on 8th and Eaton Avenues are being reviewed in conjunction with the PennDOT permits. Upgrade of the Monocacy Way Trail grade crossing on Eaton Avenue/Schoenersville Road should also be considered for incorporation into the Master Plan because many of the future tenants will be heavily using the trail for transportation purposes.
12. More detail will be required for the greenspace and recreation areas as the residential complex is further designed and constructed.
13. To the east of the Martin Tower site is the Burnside Plantation, which is listed on the National Register of Historic Places. The site is also Lehigh County Park land. The Plan shall include protections to the historic site related to building height and setback as required in the Ordinance. The Plan shall also protect the historic site from additional impacts such as noise, stormwater runoff, viewshed, lighting, etc. It is unclear whether the sight lines shown in the plan are accurate. The city will need to ensure that the buffer and building heights are adequate to protect Burnside as the project progresses.
14. Discussion of dedication of roadways will need to take place with City staff. All roads are to be constructed to City standards if to be dedicated. Cross sections provided only show 4' wide sidewalk, City standards require 5' wide sidewalk on BOTH sides of the roadway.
15. Copies of all approved Highway Occupancy Permits from PennDOT shall be submitted.
16. 8th Ave. between the PA 378 interchange & Eaton Ave. is a minor arterial. Commercial uses, as proposed for Lots 7 & 8, shall be considered for structures fronting this corridor. Furthermore, a mix of commercial & residential uses should be considered along the Boulevard for structures on Lots 3 & 5.

The following are comments that will require attention as the project moves forward to additional land development phases.

PUBLIC WORKS

Engineering

Stormwater

1. A Stormwater Management Report is required and shall be submitted to LVPC and a copy of their approval letter shall be included in a future submission.

Sanitary

1. In accordance with Ordinance No. 4342, at the time of execution of the Developer's Agreement, a sanitary sewer tapping fee will need to be paid. The developer shall submit a cover letter explaining the project along with a sanitary sewage planning module. A tapping fee will be calculated after review of the proposed sanitary flows.

Miscellaneous Engineering

1. An Erosion and Sediment Control Plan is required and shall be reviewed by DEP. A copy of the NPDES Permit will be required.
2. Discussion over dedication of roadways will need to take place with City staff. All roads are to be constructed to City standards if to be dedicated. Cross sections provided only show 4' wide sidewalk, City standards require 5' wide sidewalk on BOTH sides of the roadway.
3. Scaled drawings shall be provided for all future plans submitted.

4. Copies of all approved Highway Occupancy Permits from PennDOT shall be submitted.
5. All properties will be given addresses at the time of land development review.
6. This master plan lacks much of the information necessary for a thorough engineering evaluation and has been reviewed only for general conformance to City of Bethlehem standards to the extent permitted by the limited detail provided. Additional comments will be provided when a more detailed plan is submitted for review.

Traffic

1. PennDOT shall review the new uses and projected trips against the approved HOP and traffic study, since many of the uses have changed. Please copy the City and the City's Traffic Engineer, Peter Terry, on all correspondence to / from PennDOT.
2. More detailed comments will follow once Land Development Plans are submitted.

Forestry

1. Create a centralized park where all tenants and the public can access and enjoy.
2. On slide 16, the site lines shown will be different in Fall and Winter with no leaves on deciduous trees, buildings will be seen.
3. On secondary street slide 15, is the scale correct? Parkway width, sidewalk, etc.?
4. All street trees shall be between curb and sidewalk. Slide 15 under secondary street shows the opposite.

FIRE

1. Dead end fire access roadways may have a maximum length of 150' without a turnaround. (Refer to International Fire Code, 2018 ed., Section 103 and Appendix D for additional information.)
2. All buildings less than 30 feet in height must have 20 foot wide, minimum, access road(s). All buildings 30 feet or greater in height must have 26 foot wide, minimum, access road(s) and must accommodate a fire apparatus weighing 84,000lbs. (Refer to International Fire Code, 2018 ed., Section 503 and Appendix D for additional information.) At least one of the required access roads meeting this condition shall be located within a minimum of 15 feet (4572 mm) and a maximum of 30 feet (9144 mm) from the building, and shall be positioned parallel to one entire side of the building. (Refer to International Fire Code, 2018 ed., Section 503 and Appendix D for additional information.)
3. Additional requirements will be noted as the project progresses into the Land Development phase.
4. Contact the City of Bethlehem Fire Department office at 610-865-7143 and request Fire Marshal Craig Baer (cbaer@bethlehem-pa.gov) or Chief Fire Inspector Michael Reich at (mreich@bethlehem-pa.gov) with any question reference Fire Code requirements.

ZONING

1. Provide Zoning Data for proposed versus required per 1314.02 for all associated lots and uses separately.
2. Provide minimum and maximum percentage of building floor area for Office, Institutional, Light Industrial and related uses as well as Retail, Restaurant, Entertainment and related uses per 1314.03(a). Master Plan does not differentiate between Types of Commercial in percentage calculation.
3. Provide elevation drawings per 1314.01(a)(2) to ensure no portion of the front facade of any non-residential building shall be composed of vehicle garage door(s). For residential buildings, no more than 60% of the first-floor front façade of any building shall be composed of vehicle garage doors. In addition, Surface off-street parking and any garage doors shall be located to the rear or side of principal buildings, as opposed to being newly placed between the front lot line along a street and the front wall of a new principal building. In the OMU District, garage doors shall be located to the rear or side of principal non-residential and mixed-use buildings. This provision shall not limit rearrangement of spaces within existing parking areas. If such lot is adjacent to two or more streets, this restriction shall only apply to the one street that is the most heavily traveled by vehicles.
4. Provide setback measurements of structures for each individual lot.
5. Provide Landscaping Plan to ensure an average of at least one street tree shall be planted for each 30 feet of street length, unless existing trees will be preserved to serve the same purpose. The spacing of

such trees may vary to provide for driveways, sight distance and other features, provided the average separation of trees is met.

6. Submit a set of preliminary architectural sketch or elevation plans of the front facades and a description of proposed front facade materials to the City.
7. Indicate bike rack locations and types per 1319.02(o).
8. Provide dumpster locations and construction details.
9. Any proposed signage will be reviewed under a separate cover.
10. Insofar as practical, natural features on the site shall be preserved. See Articles 1316, 1317 and other natural feature provisions per 1322.02(d)(1). Proposed detention basin shall be relocated due to steep slopes and the disturbance of natural features.
11. Per 1322.02(d)(4) Electric and telephone lines shall be underground where practical. Any utility installations remaining above ground shall be located so as to have a harmonious relation to neighboring properties and the site. Provide locations of said utilities on Site Plan.
12. Clearly indicate ADA space locations and front entrances of all structures per 1319.02(n).
13. Provide traffic flow patterns, parking space stall measurements as well as clear sight triangles and aisle widths per 1319.03 and 1318.06.

GENERAL

1. A recreation fee will be required for all residential units.
2. Comments from the Environmental Advisory Council are attached.
3. LANTA currently operates public transportation service directly to the project location, with two northbound bus stops along the property frontage at the 8th Avenue and Eaton Avenue intersection and the 8th Avenue and Martin Court intersection, respectively. These existing bus stop locations are currently connected with the existing sidewalk and crosswalk network on 8th Avenue and Eaton Avenue.
4. The proposed revised Master Plan has conceptually highlighted LANTA's existing bus stops on the Site Circulation plans to comprehensively integrate with the proposed vehicular, bicycle, and pedestrian networks. The proposed pedestrian network, particularly, will be the key connectivity from the existing bus stops to the proposed mixed-use destinations within the complex.
5. The developer is strongly encouraged to continue engaging with LANTA's Planning Department for transit supportive land use details at the existing bus stop locations. Please do not hesitate to contact Molly Wood at 610-776-7433 x165 or mwood@lantabus-pa.gov.

This item will be placed on the February 9, 2023 Planning Commission Meeting Agenda.

Sincerely,



Darlene L. Heller, AICP
Director of Planning and Zoning

Cc: B. Yandem D. Shaffer
 P. Stefanelli M. Reich
 A. Rohrbach N. Herrick, Herrick Co.
 T. Wells D. Wagner, LBD Commercial

Enclosure



Turning Performance Analysis

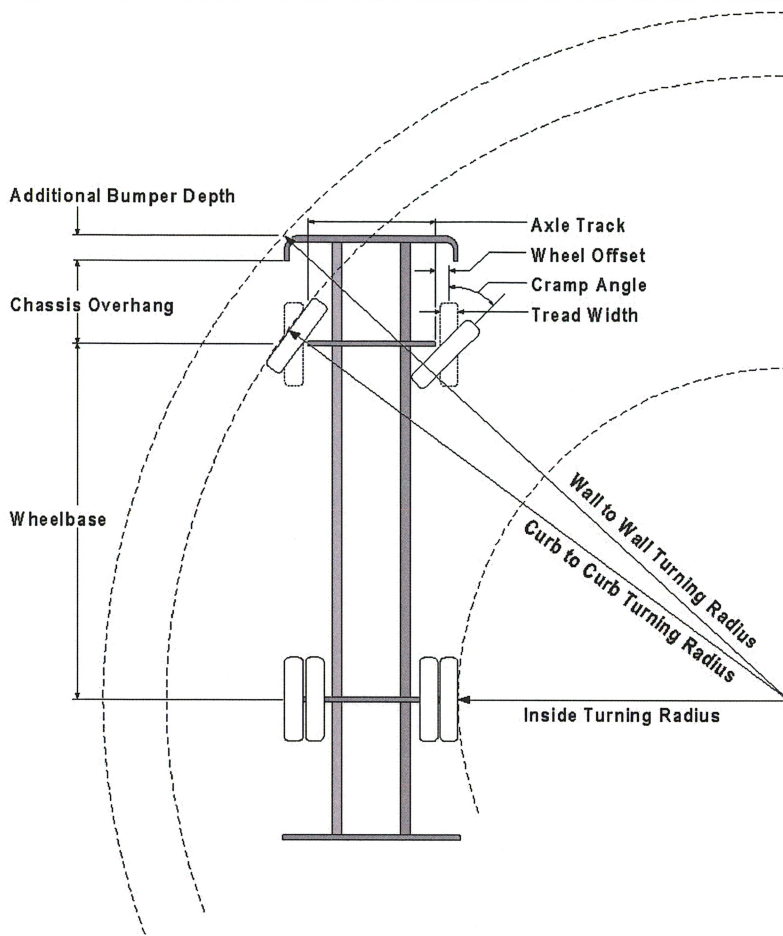
02/01/2016

Bid Number: 365

Department: Bethlehem City Fire Dept

Chassis: Velocity Chassis, PAP/Midmount (Big Block), 2010

Body: Aerial, Platform, 95', Mid-Mount, Alum Body



Parameters:

Inside Cramp Angle:	45°
Axle Track:	82.92 in.
Wheel Offset:	5.25 in.
Tread Width:	17.7 in.
Chassis Overhang:	78 in.
Additional Bumper Depth:	7 in.
Front Overhang:	85 in.
Wheelbase:	274.5 in.

Calculated Turning Radii:

Inside Turn:	21 ft. 8 in.
Curb to curb:	38 ft. 9 in.
Wall to wall:	43 ft. 1 in.

Comments:

Category Description:	OptionID:	Option Description:
Axle, Front, Custom	0637059	Axle, Front, Oshkosh TAK-4, Non Drive, 24,000 lb, Velocity (425 Tires)
Wheels, Front	0001656	Wheels, Front, 22.50" x 12.25", Steel, Hub Pilot
Tires, Front	0677684	Tires, Front, Michelin, XFE (wb), 425/65R22.50, 20 ply, Fire Service Load Rating
Bumpers	0633464	Bumper, Non-Extended, Steel, Painted, Imp/Vel
Aerial Devices	0592911	Aerial, 95' Pierce PAP, Mid Mount

Notes:

Actual Inside cramp angle may be less due to highly specialized options.

Curb to Curb turning radius calculated for 9.00 inch curb.

WEIGHT REVIEW ESTIMATE

Job # 29396

BETHLEHEM

Reviewed By: JBL

Date Reviewed: 10-28-15

The following are the estimated fully loaded weights including all people, water/foam, hose, and NFPA equipment allowances:

	<u>Front Axle</u>	<u>Rear Axle</u>
Rating	24,000 LB	60,000 LB
Total Weight	23,266 LB	59,543 LB
Reserve Capacity	734 LB	457 LB
Distribution	28%	72%

REVIEWED & ACCEPTED
WITH CHANGES

Robert Novatnack

Robert Novatnack, Fire Chief
December 8, 2015



Darlene L. Heller, Director of Planning and Zoning
Craig Peiffer, Assistant Director of Planning and Zoning
City of Bethlehem
10 E. Church Street
Bethlehem, PA 18018

January 31, 2023

Dear Ms. Heller and Mr. Peiffer,

The Bethlehem City Environmental Advisory Council appreciates the opportunity to comment on the revised Master Plan for Tower Place development, 1170 8th Avenue. Our recommendations are in support of Bethlehem City's Climate Action Plan, which aims to reduce our carbon footprint, increase sustainability and utilize alternative energy sources.

We commented on the development of the Martin Tower site in letters to City Council, the Department of Planning & Zoning and the Planning Commission in 2016, 2019, 2021 and 2022. Our concern for the protection of the Monocacy Creek, which abuts the property, and our recommendations that the development incorporate sustainable design, greenery in the form of new trees and landscaping with native species, buffers adjacent to the Monocacy Creek and Burnside Plantation, green stormwater infrastructure and renewable energy, remain unchanged.

The developer has the opportunity to redevelop this site into a showpiece of sustainable design, in keeping with the goals of the City's Climate Action Plan and every effort should be made to employ these principles.

The EAC offers the following comments and recommendations based on the revised 2023 Master Plan.

Parking/Pavements

- Inclusion of podium parking is a positive change to the Master Plan.
- Consider permeable, porous or cool pavements to combat heat and help filter stormwater.
- Angled parking spaces would allow narrowing of access roadways and larger medians.
- Lots 2 and 4: Consider moving parking to the other side of the building.

Trees

Note that the mature trees that were cleared had a higher carbon sequestration capacity than new plantings. Trees also provide cooling to counteract the heat, reduce stormwater runoff, remove pollutants and sediments from runoff and improve air quality.

- Compensate for the felling of mature trees. The EAC strongly recommends replacement on a 2 to 1 basis.
- Use native tree species that will be tolerant of changes in climate.
- Plant trees that grow to a larger mature size.
- Ensure that new trees are planted and cared for correctly in both the short and long term. For example, remove the cage around the balled and burlapped trees, dig holes to appropriate depth, water new plantings, etc. We can provide guidance in this respect.
- Trees should not be sacrificed in the creation of the new Nature Trail.

Green space:

Like trees, green spaces slow and filter stormwater runoff, mitigate the heat island effect and provide habitat for the wildlife. Furthermore, green space as part of a development creates the opportunity to improve quality of life. Natural light and connection to the environment has been proven to add to productivity and relieve stress.

- Areas of green space interspersed between buildings should incorporate native, pollinator friendly vegetation as opposed to lawns that required high maintenance.

Buffer area:

The natural corridors that abut the property support and maintain existing wildlife and absorb storm water runoff.

- Strongly recommend a minimum buffer adjacent to wooded areas and slopes of 200 feet. We cannot judge the proposed buffer width from the plans.
- Direct light from buildings and parking lots inward so that it does not encroach upon open space, disrupting native species and impacting their behavior.

Stormwater management

Traditional methods of stormwater management do not account for recent increases in the severity of rainfall events, necessitating the use of innovative methods of storm water control and proactive measures. The City complies with permitting requirements for Municipal Separate Stormwater Sewer Systems (MS4).

- Integrate stormwater management onsite and include the removal of contaminants, as opposed to channeling it offsite.
- The stormwater retention pond should be designed to accommodate predicted precipitation events that account for the impact of climate change on rainfall amounts and frequency.
- We recommend that the detention pond incorporate natural habitat for wildlife.
- Pollutants and contaminants from automobiles and salt are of particular concern. Natural swales and wetlands would absorb and filter storm water and provide wildlife habitat.

Energy

- New construction projects provide opportunities to employ energy saving strategies that will lower energy costs and at the same time reduce pollution from

traditional energy sources. Therefore, we strongly recommend that the developer utilize sustainable building materials and energy efficiency measures beyond the building code, such as passive solar design features, advanced lighting controls, high efficiency HVAC equipment, increased insulation, and advanced air sealing techniques.

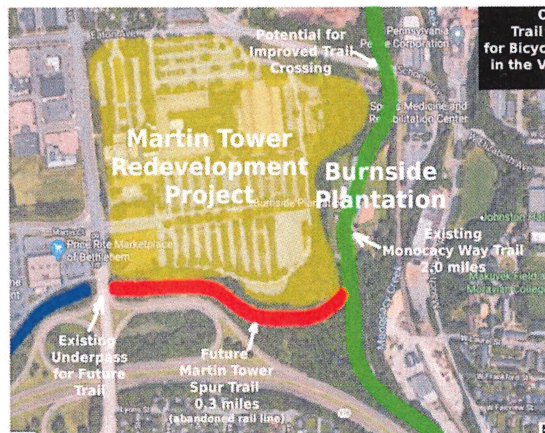
- We urge the developer to complete a solar assessment for solar panels on all buildings and in parking lots.
- Install solar panels where feasible. Note that there are currently tax credits for new solar systems. Furthermore, Northampton County adopted the Commercial Property Assessed Clean Energy (C-PACE) program. C-PACE is an innovative financial tool that allows financing for solar, increased energy efficiency and water conservation projects to be attached to the property instead of the owner. This can free up developers' finances by placing the assessment on the property and structuring repayment through property taxes. Note that C-PACE has been expanded to include projects for multi-family dwellings, IAQ and resilience.
- Install electric vehicle charging stations in both residential and commercial sections of the development.

Bike friendly

- In their letter of April 2021, the Coalition for Appropriate Transportation (CAT) diagramed a potential spur to connect the north-south D&L Trail to an east-west corridor from Burnside Plantation to Allentown. Please see the explanation and diagram excerpted from their letter below, which the EAC supports.

This moment is an excellent opportunity to link the developer's proposed businesses and residences by way of the adjoining Monocacy Way trail and an abandoned tree covered railroad spur that heads west under 8th Avenue to Pennsylvania Avenue, ending just shy of Airport Road. In 20 or 50 years when we look back on this project, it could be seen as kickstarting a crucial branch of east-west multi-use rail trail that will have connected so many west and north Bethlehem neighborhoods with these businesses, downtown, and Bethlehem's Memorial and Illick's Mill Parks. This off-street trail connection would provide both recreation and useful human-powered transportation opportunities in-line with the [City of Bethlehem's Climate Action Plan](#) and LVPC's regional [Walk/Roll/LV Active Transportation Plan](#). It is specifically identified in 2016's "[BETH CONNECTS: A Trail Study for the Bethlehem Area](#)"

While a 2+ mile rail trail might seem ambitious out of the gate, a starting point with this project should be to connect the Monocacy Way trail to 8th Avenue, a 0.3 mile long section that follows the southern border of the Martin Tower project. (shown in red as Future Martin Tower Spur Trail" in the image to the right)



Potential trail connections around Martin Tower site (CAT concept)

- Another recommendation is the inclusion of "easily-accessible, secure, sheltered bicycle parking" as recommended in the CAP (Transportation Strategies T1.2 and T1.9). Bicycle parking outside businesses and secure indoor/outdoor bike parking for residents and visitors alike would be ideal.

Bird Window Collisions

“Peer-reviewed, published research estimates that a minimum average of one million birds collide with windows in the USA daily; 365 - 988 million annually.” (Overview and Executive Summary of the Bird collision Working Group Project, Feb. 12, 2020)

After habitat loss, glass is the biggest killer. The majority of bird strikes occur in low rise (4 stories and less) and residential buildings. We would be happy to provide more information.

- Encourage inclusion of physical barriers in front of glass and/or make glass visible to birds on the outside surface. Many products are available.

Thank you for your consideration.

Respectfully,

Lynn Rothman

Lynn Rothman, Chair

On behalf of the Bethlehem EAC:

Ben Felzer, Vice Chair

Ben Guthrie, Secretary

Vibhor Kumar

Mandy Tolino

Mike Topping

Katie Trembler

cc: Mayor J. William Reynolds

Honorable Members of City Council

Scott Slingerland, P.E., Executive Director, CAT